

DREXWELL M. JONES, SBN 221112
LAW OFFICES OF BRUNN & FLYNN
A Professional Corporation
928 12th Street, Suite 200
Modesto, CA 95354
Telephone: (209) 521-2133
Facsimile: (209) 521-7584

Attorneys for Respondent, TARA KRAUSE

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA**

MICHAEL KRAUSE,

Petitioner,

vs.

TARA KRAUSE,

Respondent.

Case No.: 1:21-cv-01706-JLT-SAB

**DECLARATION OF DREXWELL M. JONES
IN SUPPORT OF RESPONDENT'S MOTION
TO FIX AWARD OF ATTORNEY'S FEES AND
COSTS**

Action Filed: November 30, 2021

Trial date: November 3, 2022

I, Drexwell M. Jones, hereby declare:

1. I am a licensed attorney admitted to practice law in the United States District Court for the Eastern District of California. My firm represents Tara Krause in the above-captioned matter.

2. This declaration is made in support of Respondent's Motion to Fix Award of Attorneys' Fees following entry of the Court's Findings and Recommendations Granting in Part Respondent's Motion for Sanctions filed March 16, 2023 .

3. I have personal knowledge of the matters stated herein, and if called as a witness could and would testify thereto.

4. On November 3, 2022, the Court held an evidentiary hearing on Respondent's Motion for Sanctions.

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5. On March 16, 2023, the Court filed its Findings and Recommendations Granting in Part Respondent's Motion for Sanctions, and awarding attorney's fees and costs incurred after the May 18, 2022 hearing.

6. On April 3, 2023, the Court filed an Order adopting in full the Findings and Recommendations filed on March 16, 2023.

7. On April 3, 2023, the Court entered Judgment in accordance with the Court's Order filed April 3, 2023.

8. Since the May 18, 2022 hearing to the present date, Respondent has accrued \$62,815.00 in legal fees and \$2,297.25 in costs.

9. Declarant was admitted to practice on December 5, 2002. Declarant billed 139.9 hours against the file from May 18, 2022 through March 29, 2023, and billed at a rate of \$400.00 per hour on this file (\$55,960).

10. Attorney Gerald E. Brunn was admitted to practice on December 3, 1982. Mr. Brunn billed .40 hours against the file on March 16, 2023, and billed at a rate of \$425.00 per hour on this file (\$170.00).

11. Heather J. McCauley, a certified paralegal, billed 32.40 hours against the file from May 18, 2022 through March 31, 2023 and billed at a rate of \$175.00 per hour on this file (\$5,670.00).

12. Diane J. Porter, certified paralegal, billed 5.8 hours against the file from May 23, 2022 through March 17, 2023 and billed at a rate of \$175.00 per hour on this file (\$1,015.00).

13. The total amount of time billed from after the May 18, 2022 hearing to the present date, exclusive of discounts and time spent in the preparation of this motion, is:

Drexwell M. Jones, Esq.	\$55,960.00
Gerald E. Brunn, Esq.	\$ 170.00
Heather J. McCauley, Paralegal	\$ 5,670.00
Diane Porter, Paralegal	<u>\$ 1,015.00</u>
TOTAL	\$62,815.00

14. A true and correct copy of BRUNN & FLYNN's contemporaneously created billing entries related to the above-captioned matter is attached hereto as Exhibit A.

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15. The total amount of costs incurred from May 18, 2022 through December 5, 2023, is \$2,297.25. True and correct copies of the receipts for the costs related to the above-captioned matter are attached hereto as Exhibit B.

16. Emails have been exchanged between counsel regarding whether that was even a potential for reaching a settlement regarding attorney fees. As Petitioner filed a motion for reconsideration, the possibility of reaching a settlement at this time, does not seem likely.

I declare under penalty of perjury, under the laws of the State of California, that the foregoing is true and correct. Executed this 14th day of April, 2023, at Modesto, California.

DREXWELL M. JONES, ESQ.

K:\docs\casess\6892-21288\Motions\Mot for Attys Fees & Costs)\Dec of DMJ

EXHIBIT A

June 10, 2022

TLSKrause@gmail.com

File#: 6892-21288

Invoice#: 97132

Re: Krause, Tara

Date	Fees	Hours	Amount
	[REDACTED]		
05/18/22	[REDACTED]		
	[REDACTED]		
	DMJ Communicate with [REDACTED]	0.5	200.00
	DMJ Draft/review/revise Trial documents.	0.7	280.00
	DMJ Draft Trial Brief.	3.8	1,520.00
	HJM Prepare list of exhibits; assemble exhibits in binder and tabs.	1.0	175.00
	HJM Prepare Witness List at Trial.	0.3	52.50
	HJM Save all exhibits and Discovery to be submitted to court for Trial in directory; upload exhibits and Discovery to court's dropbox.	1.8	315.00
	HJM Revise Stipulation regarding witness video appearance at Trial; prepare email to opposing counsel enclosing signed Stipulation.	0.3	52.50
	HJM Prepare List of Discovery to be offered at Trial.	0.5	87.50
	HJM E-file Witness List with court and serve.	0.2	35.00
	HJM E-file List of Discovery Requests and Responses.	0.2	35.00
	HJM E-file Exhibit List.	0.2	35.00
	HJM Prepare email to opposing counsel enclosing Exhibit List and serving final exhibits; upload exhibits to Dropbox to send link.	0.4	70.00
	HJM Review and revise Trial Brief.	0.6	105.00
	HJM Review, print and save all Petitioner's Trial related filings.	0.4	70.00

June 10, 2022

TLSKrause@gmail.com

File#: 6892-21288

Invoice#: 97132

Re: Krause, Tara

Date	Fees	Hours	Amount
	HJM Scan and efile Trial Brief.	0.2	35.00
05/19/22	DMJ Prepare updated Initial Disclosure Statement.	0.2	80.00
	DMJ Scan and e-file Amended Initial Discovery Statement.	0.2	80.00
	DMJ Draft letter to [REDACTED] regarding [REDACTED] to subpoena on [REDACTED]	1.0	400.00
	DMJ Communicate with opposing counsel [REDACTED]	0.2	80.00
	DMJ Legal research regarding Rule 11 cases based on prosecution after case is moot based on jurisdiction.	2.3	920.00
05/20/22	DMJ Legal reseach regaridng Sanction Motions and availability of sanctions.	2.1	840.00
	DMJ Draft Rule 11 Motion for Sanctions.	1.5	600.00
	DMJ Draft Motion for Sanctions under 28 USCS section 1927 and the court's inherent powers.	0.9	360.00
	DMJ Draft Declaration of Tara Krause in support of Motion for Sanctions under Rule 11.	1.2	480.00
	DMJ Legal research regarding attorney fees awarded on Motion to Dismiss.	2.3	920.00
	HJM Review and revise Notice of Motion and Motion for Sanctions (FRCP Rule 11).	0.4	70.00
	HJM Revise and revise Declaration of Attorney Drexwell Jones ISO Motion for Sanctions (FRCP Rule 11); copy and assemble exhibits.	0.4	70.00
	HJM Scan and serve Motion for Sanction documents on Opposing Counsel by email.	0.3	52.50
05/23/22	DJP Set up laptop for Trial with entire file.	0.3	52.50
	DMJ Review email from Petitioner's Counsel regarding Stipulation for Motion to Dismiss and report same to		

June 10, 2022

TLSKrause@gmail.com

File#: 6892-21288
Invoice#: 97132

Re: Krause, Tara

Date	Fees	Hours	Amount
	client.	0.5	200.00
DMJ	Legal research regarding Motion to Dismiss and entitlement to attorney fees and costs.	3.2	1,280.00
DMJ	Legal research regarding case law cited in Petitioner's Trial Brief.	3.5	1,400.00
05/24/22 DJP	Travel to/from court to attend IT meeting (cancelled a few minutes before scheduled time).	4.5	787.50
DMJ	Review Petitioner's Motion to Dismiss and supporting Declaration by Michael Krause.	0.5	200.00
DMJ	Draft response to Petitioner's Motion to Dismiss to Request Costs and Fees.	2.8	1,120.00
DMJ	Draft response to Petitioner's Motion to Dismiss to Request Costs and Fees.	0.7	280.00
DMJ	Draft Declaration of Drexwell M. Jones in support of response to Petitioner's Motion to Dismiss.	0.5	200.00
DMJ	Prepare for Evidentiary Hearing by [REDACTED]	1.8	720.00
DMJ	Review Judge's Order converting the Evidentiary Hearing to a Status Conference.	0.1	40.00
HJM	Assemble and index Trial binder.	1.0	175.00
HJM	Review and revise Declaration of Tara Krause ISO of Response to Petition's Motion to Dismiss; copy and assemble exhibits.	0.4	70.00
HJM	Email Declaration to client to sign via DocuSign.	0.2	35.00
HJM	Telephone call with court clerk Oscar regarding IT confirmation still on calendar.	0.1	17.50
HJM	Review and revise Response to Motion to Dismiss and Declaration of Attorney Drexwell Jones; copy and assemble exhibits.	0.4	70.00

June 10, 2022

TLSKrause@gmail.com

File#: 6892-21288

Invoice#: 97132

Re: Krause, Tara

Date	Fees	Hours	Amount
	HJM Scan and e-file Response to Motion to Dismiss.	0.4	70.00
	HJM Index pleadings and organize file.	0.5	N/C
05/25/22	DMJ Appear at Status Conference Hearing.	0.7	280.00
	DMJ Review the court's Order regarding briefing schedule for Sanctions Motions.	0.1	40.00
	DMJ Legal research regarding offer of proof to issue subpoena or other Orders to Compel cooperation of Air Force commander.	1.1	440.00
	DMJ Draft/revise producer agreements to include case and stock payouts.	0.9	360.00
05/27/22	DMJ Legal research regarding the Privacy Act, 5 USCS 522a, and requirements/procedure to obtain protected information.	1.6	640.00
	DMJ Legal research Air Force Instruction 51-301 regarding process to obtain Official Information in third party civil cases.	1.5	600.00
	DMJ Draft detailed letter to Lt. Col. Rebecca Schmidt regarding [REDACTED] objections [REDACTED]	1.9	760.00
	HJM Review and revise letter to Lt. Col. Schmidt regarding Mikita Brown subpoena.	0.3	52.50
05/30/22	DMJ Legal research regarding non Rule 11 sanctions.	3.1	1,240.00
05/31/22	DMJ Legal research regarding whether a Motion to Dismiss negates a violation of Rule 11 sanctions.	2.1	840.00
Total fees		112.1	\$39,307.50

June 10, 2022

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Invoice#: 97132

Re: Krause, Tara

Date	Costs	Amount
05/11/22	Postage	26.95
05/11/22	UPS from client.	17.69
05/12/22	Cindy Rister-Saunders - Certified copy of hearing transcript.	114.00
05/13/22	VCP - Service upon Investigator Sepeda for Lt. Colmikita Brown.	434.10
05/24/22	Diane Porter - Travel to court for IT meeting (196 miles x .585/mile)	114.66
05/31/22	Lexis Nexis - May public records access/research	793.58
Total costs		<u>\$1,500.98</u>
Total fees and costs		<u>\$40,808.48</u>
Amount due --->		<u><u>\$40,808.48</u></u>


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www.brunnandflynnlaw.com

July 18, 2022

TLSKrause@gmail.com

File#: 6892-21288
 Invoice#: 97349

Re: Krause, Tara
 adv.
 Krause, Michael

Date	Fees	Hours	Amount
06/01/22	DMJ Draft Motion for Sanctions and Supporting Declarations.	8.3	3,320.00
	HJM Review and revise Declaration of Attorney Drexwell Jones; copy and assemble exhibits.	0.5	87.50
	HJM Scan and e-file Motion for Sanctions with court.	0.4	70.00
	HJM Review and revise Motions for Sanctions.	0.4	70.00
	HJM Review and revise Declaration of Tara Krause.	0.2	35.00
	HJM Email Declaration to client via Docusign.	0.2	35.00
	HJM Copy and assemble exhibits to Declaration of Krause.	0.3	52.50
06/08/22	DMJ Review Petitioner's Motion for Sanctions.	0.8	320.00
	DMJ Legal research regarding grounds for Petitioner's Motion for Sanctions.	3.2	1,280.00
06/13/22	DMJ Legal research regarding Sanctions for Disclosure of Settlement discussions.	6.5	2,600.00
06/14/22	DMJ Draft reply to Motion for Sanctions.	5.5	2,200.00
	HJM Review and revise Reply to Petitioner's Motion for Sanctions.	0.6	105.00
	HJM Further revisions to Reply to Petitioner's Motion for Sanctions.	0.2	35.00
	HJM Scan and e-file Reply to Petition's Motion for Sanctions.	0.2	35.00
06/16/22	DMJ Review opposition to Motion for Sanctions and Supporting Declarations.	1.2	480.00

July 18, 2022

TLSKrause@gmail.com

File#: 6892-21288

Invoice#: 97349

Re: Krause, Tara

Date	Fees	Hours	Amount
	DMJ Review correspondence from Staff Judicial Advocate, Rebecca Schmidt, regarding anticipated subpoena and legal research regarding Uniform Code of Military Justice provisions regarding perjury and whether SJA's are mandatory reporters to determine whether to send Lt. Col. Krause's recent Declaration wherein he seemingly commits perjury.	1.5	600.00
06/22/22	DMJ Draft reply to Opposition to Motion for Sanctions.	2.9	1,160.00
	HJM Prepare draft Reply to Opposing to Motion for Sanctions.	0.2	35.00
	HJM Review and revise Reply to Opposing to Motion for Sanctions.	0.3	52.50
	HJM Scan and e-file Reply to Opposing to Motion for Sanctions.	0.2	35.00
	Total fees	33.6	\$12,607.50

Date	Costs	Amount
06/30/22	Lexis Nexis - June public records access/research	216.21
	Total costs	\$216.21
	Total fees and costs	\$12,823.71
	Amount due --->	\$12,823.71

July 18, 2022

TLSKrause@gmail.com

File#: 6892-21288

Invoice#: 97349

Re: Krause, Tara

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August 17, 2022

TLSKrause@gmail.com

File#: 6892-21288

Invoice#: 97552

Re: Krause, Tara
adv.
Krause, Michael

Date	Fees	Hours	Amount
07/06/22	DMJ Prepare for oral arguments regarding Motions for sanctions.	2.5	1,000.00
	DMJ Attend Hearing on Motions for sanctions, which was ultimately continued.	0.5	200.00
07/07/22	DMJ Review correspondence with Staff Advocate Judge to determine whether subpoena issued by attorney can compel attendance by officer.	0.5	200.00
07/28/22	DMJ Legal research regarding [REDACTED] party Depositions [REDACTED] for purposes of a Evidentiary Hearing.	1.5	600.00
	DMJ Legal research regarding court ordered compliance to subpoena served on military commanders.	1.5	600.00
	Total fees	6.5	\$2,600.00

Date	Costs	Amount
07/31/22	Lexis Nexis - July public records access/research	13.37
	Total costs	\$13.37
	Total fees and costs	\$2,613.37
	Amount due --->	\$2,613.37

August 17, 2022

TLSKrause@gmail.com

File#: 6892-21288

Invoice#: 97552

Re: Krause, Tara

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September 19, 2022

TLSKrause@gmail.com

File#: 6892-21288

Invoice#: 97760

Re: Krause, Tara
adv.
Krause, Michael

Date	Fees	Hours	Amount
08/04/22 DMJ	Legal research regarding procedure for Judge signed subpoena ad testificandum.	1.3	520.00
08/19/22 DMJ	Legal research regarding application for court issued subpoena.	4.5	1,800.00
08/26/22 DMJ	Draft/communicate request to consent to disclosure of personal records to counsel of Petitioner to comply with local rule 250(b) to meet and confer prior to filing Motions.	0.9	360.00
	Total fees	6.7	\$2,680.00

Date	Costs	Amount
08/31/22	Lexis Nexis - August public records access/research	44.71
	Total costs	\$44.71
	Total fees and costs	\$2,724.71
	Amount due --->	\$2,724.71

September 19, 2022

TLSKrause@gmail.com

File#: 6892-21288

Invoice#: 97760

Re: Krause, Tara

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www.brunnandflynnlaw.com

October 18, 2022

TLSKrause@gmail.com

File#: 6892-21288

Invoice#: 97957

Re: Krause, Tara
adv.
Krause, Michael

Date	Fees	Hours	Amount
09/02/22	DMJ Prepare for Hearing and attend Hearing regarding readiness for Evidentiary Hearing.	0.6	240.00
	DMJ Continued legal research regarding judge-signed subpoenas.	3.2	1,280.00
	DMJ Draft Application in support of court-issued subpoena to Lt. Col. Brown and Lt. Col. Krause.	1.3	520.00
	DMJ Draft Declaration in support of Application for court-issued subpoena to Lt. Col. Brown and Lt. Col. Krause.	0.4	160.00
	HJM Review and revise Notice of Appearance and Appearance for Court Issued Subpoena.	0.2	35.00
	HJM Review and revise Declaration of Attorney Drexwell Jones ISO Appearance for Court Issued Subpoena; assemble exhibits.	0.3	52.50
	HJM Scan and e-file Application documents with court.	0.3	52.50
09/14/22	DMJ Legal research regarding service of an officer on military base and provision regarding subservice; search for information regarding Lt. Mikita Brown's personal residences.	2.5	1,000.00
	HJM Prepare subpoena to Lt. Col. Mikita Brown with production of documents.	0.4	70.00
	HJM Prepare subpoena to Lt. Col. Michael Krause with production of documents.	0.4	70.00
	HJM Telephone call with Beale AFB investigator Sneddon regarding service of subpoenas on Brown and Krause.	0.4	70.00

October 18, 2022

TLSKrause@gmail.com

File#: 6892-21288

Invoice#: 97957

Re: Krause, Tara

Date	Fees	Hours	Amount
09/19/22	DMJ Review Order regarding Judge signed subpoenas.	0.1	40.00
	HJM Prepare service instructions to Process Server Mark Zurilgen regarding service of subpoena on Michael.	0.3	52.50
	HJM Prepare email to client regarding Mr. Krauses' work schedule and gate access to apartment.	0.2	35.00
	HJM Updated subpoenas to Mr. Krause and Lt. Col. Makita Brown; prepare subpoena to Savannah Wadsworth.	0.3	52.50
	HJM Prepare email to Judge Boone's clerk regarding submission of proposed subpoenas for Judge's approval.	0.2	35.00
	HJM E-file proposed subpoenas with court; preparation of email to Judge Boone's office enclosing Word versions of proposed subpoenas for Judge's signature; review, print and save subpoenas signed by Judge.	0.6	105.00
	HJM Telephone call with Lt. Col. Mikita Brown's office; telephone call with Captain Francis Anderson at Beale Legal Department regarding service of subpoena on Mikita Brown.	0.4	70.00
	HJM Telephone call with Process Server Mark Zurilgen regarding service of subpoenas.	0.2	35.00
09/20/22	DMJ Communicate with Major Newton regarding Lt. Col. Brown's travel orders; receipt and review on TTY order.	0.3	120.00
09/22/22	DMJ Receive communicate from Major Newton regarding Lt. Col. Brown's availability; Communicate with opposing counsel regarding Stipulation to Continue Hearing; draft Motion and Supporting Declaration to Continue the Evidentiary Hearing at the request of the Air Force.	1.5	600.00
	HJM Review and revise Motion to Continue Evidentiary Hearing; Declaration of Attorney Drexwell Jones and proposed Order.	0.6	105.00
	HJM Scan and e-file Motion to Continue Evidentiary Hearing with court.	0.3	52.50
09/23/22	DMJ Identify documents to exchange as exhibits for		

October 18, 2022

TLSKrause@gmail.com

File#: 6892-21288

Invoice#: 97957

Re: Krause, Tara

Date	Fees	Hours	Amount
	Evidentiary Hearing, work on witness list; review exhibits to exchange.	0.5	200.00
	HJM Prepare Witness List for Evidentiary Hearing.	0.3	52.50
	HJM Copy and scan proposed exhibits for Evidentiary Hearing.	0.5	87.50
	HJM Prepare email to opposing counsel enclosing proposed exhibits.	0.2	35.00
09/26/22	DMJ Review Declaration of Michael Krause filed in response to continuance. Review Order continuing Evidentiary Hearing.	0.2	80.00
	HJM Prepare Respondent's Exhibits List.	0.4	70.00
	HJM Prepare Discovery List.	0.4	70.00
	HJM Copy, scan and assemble Discovery and additional exhibits; mark exhibits.	0.4	70.00
	HJM Revise Witness List.	0.2	35.00
09/30/22	DMJ Appear at Status Conference Hearing.	0.5	200.00
	Total fees	18.6	\$5,752.50

Date	Costs	Amount
09/21/22	VCP - Service upon Michael Krause and Savannah Wadsworth.	428.40
09/30/22	Lexis Nexis - September public records access/research	71.94
	Total costs	\$500.34
	Total fees and costs	\$6,252.84
	Amount due --->	\$6,252.84

October 18, 2022

TLSKrause@gmail.com

File#: 6892-21288

Invoice#: 97957

Re: Krause, Tara

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November 14, 2022

TLSKrause@gmail.com

File#: 6892-21288

Invoice#: 98192

Re: Krause, Tara
adv.
Krause, Michael

Date	Fees	Hours	Amount
10/03/22	HJM Telephone call with Beale AFB regarding coordinating service of subpoena on Brown.	0.2	35.00
	HJM Copy and assemble subpoena and Order Continue Hearing; prepare instructions to Process Server Mark Zurilgen, for service on Lt. Col. Mikita Brown.	0.2	35.00
10/05/22	HJM Telephone call with Beale AFB regarding coordinating service of subpoena; need to contact Lt. Col. Brown directly; telephone call with Process Server Mark Zurilgen regarding service of subpoena.	0.3	52.50
10/06/22	DMJ Research/investigate social media, Lexis Nexis reports, and web for information related to Lt. Col. Brown's residence.	2.1	840.00
	HJM Conduct online search and Lexis search on Mikita Brown; review Beale AFB information online.	0.8	140.00
	HJM Telephone call with Process Server Mark Zurilgen regarding service of subpoena on Brown.	0.2	35.00
10/17/22	HJM Prepare email to Tara Krause enclosing subpoena and Order to Continue Hearing to client for possible service on Lt. Col. Brown	0.2	35.00
10/18/22	HJM Review email from client and prepare response regarding Brown's vacation date information.	0.1	17.50
10/24/22	DMJ Legal research regarding service of process on domestic military institutions including Army regulation 32 C.F.R. 516.10 and the Navy equivalent in effort to determine whether the Air Force has adopted either.	6.3	2,520.00
	DMJ Draft correspondence to SJA regarding lack of cooperation in effectuating serve as a violation of Air		

November 14, 2022

TLSKrause@gmail.com

File#: 6892-21288

Invoice#: 98192

Re: Krause, Tara

Date	Fees	Hours	Amount
	Force regulations.	0.2	80.00
	HJM Telephone call with post office near Beale Air Force Base regarding Beale's mailing center contact information.	0.2	35.00
	HJM Prepare email to opposing counsel enclosing Proposed Evidentiary Hearing exhibits; review documents to include as exhibits.	0.6	105.00
	HJM Revise Respondent's List of Exhibits.	0.2	35.00
10/25/22	HJM Review email from Attorney Wadsworth; prepare attachment to subpoena to Ms. Wadsworth; scan and email Subpoena for Evidentiary Hearing to Attorney Wadsworth; prepare Proof of Service.	0.6	105.00
	HJM Telephone call with Beale Air Force Base mail center regarding proper address information needed to send certified mail to officer on base; telephone call with Tara Krause; telephone call with Security Forces office to coordinate serve of subpoena.	0.4	70.00
	HJM Organize file; index files.	0.3	N/C
10/26/22	HJM Review email from client and prepare response; telephone call with Investigator Barry Roper regarding information on Mikita Brown; prepare email to Mr. Roper enclosing subpoena and all information on Mikita Brown.	0.6	105.00
	HJM Review email from Mr. Roper, review file and prepare response regarding vehicle information for Brown and fees for service.	0.3	52.50
	HJM Prepare email to client regarding Mr. Roper's fees and request deposit.	0.2	35.00
	HJM Prepare certified mail, return receipt request to Lt. Col. Brown including subpoena.	0.3	52.50
	HJM Prepare letter to Beale Air Force Base Military Post Office; prepare letter to Brown certified, return receipt request to enclose in letter to military post office.	0.4	70.00

November 14, 2022

TLSKrause@gmail.com

File#: 6892-21288

Invoice#: 98192

Re: Krause, Tara

Date	Fees	Hours	Amount
10/27/22	DMJ Finalize witness list, exhibit list.	0.4	160.00
	DMJ Legal research regarding various standard for awarding sanctions and fees under Rule 11 versus 28 USC section 1927 and the court's inherent powers.	3.2	1,280.00
	HJM Revise Exhibit List, Witness List, Discovery List; save and name respondent's exhibits; save exhibits to Dropbox; prepare email to opposing counsel enclosing link to Dropbox.	1.5	262.50
	HJM Prepare email to court clerk regarding exhibit Dropbox.	0.2	35.00
	HJM E-file Witness List, Exhibit List and Discovery List with court.	0.4	70.00
10/28/22	HJM Prepare emails to Judge Boone's clerk regarding issues with uploading exhibits to court's Dropbox; upload exhibits to court Dropbox.	0.5	87.50
	HJM Print and assemble exhibits binders for Evidentiary Hearing.	1.0	175.00
	HJM Prepare email to Barry Roper regarding status of Lt. Col. Brown.	0.1	17.50
10/31/22	DMJ Prepare for Evidentiary Hearing, including research of Air Force Instruction 36-21110 regarding the process by which the Air Force assigns officers to new positions.	7.1	2,840.00
Total fees		29.1	\$9,382.50

Date	Costs	Amount
10/06/22	VCP - Attempted service upon Lt. Col. Mikita Brown.	350.90
10/31/22	Lexis Nexis - October public records access/research	248.82
10/31/22	Postage	17.18

November 14, 2022

TLSKrause@gmail.com

File#: 6892-21288

Invoice#: 98192

Re: Krause, Tara

Total costs	<u>\$616.90</u>
Total fees and costs	<u>\$9,999.40</u>
Amount due --->	<u>\$9,999.40</u>

*** Payment due 30 days from Invoice date ***

You may pay online:
<https://secure.lawpay.com/pages/brunnandflynnlaw/operating>

Please email billing questions to: vmoore@brunn-flynn.com

Federal ID: 94-2336259

BRUNN & FLYNN
 ATTORNEYS

928 12th Street, Suite 200, Modesto, CA 95354
 T: (209) 521-2133 F: (209) 521-7584
www.brunnandflynnlaw.com

December 13, 2022

TLSKrause@gmail.com

File#: 6892-21288
 Invoice#: 98426

Re: Krause, Tara
 adv.
 Krause, Michael

Date	Fees	Hours	Amount
11/01/22	DMJ Prepare for Evidentiary Hearing.	3.5	1,400.00
11/02/22	DJP Prepare Judicial Notice and exhibits; file with court; prepare copies for court and parties.	0.8	140.00
	DMJ Prepare for the examination of Savannah Wadworths.	1.0	400.00
	DMJ Prepare for examination of Michael Krause.	5.1	2,040.00
	DMJ Drive to Fresno.	1.5	600.00
11/03/22	DMJ Prepare for and attend Evidentiary Hearing.	8.0	3,200.00
11/16/22	DMJ Prepare for closing arguments.	1.5	600.00
	DMJ Attend Hearing to make closing arguments.	1.2	480.00
	Total fees	22.6	\$8,860.00
	Total fees and costs		\$8,860.00
	Amount due --->		\$8,860.00

December 13, 2022

TLSKrause@gmail.com

File#: 6892-21288

Invoice#: 98426

Re: Krause, Tara

*** Payment due 30 days from Invoice date ***

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Federal ID: 94-2336259



928 12th Street, Suite 200, Modesto, CA 95354
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www.brunnandflynnlaw.com

January 12, 2023

TLSKrause@gmail.com

File#: 6892-21288
Invoice#: 98710

Re: Krause, Tara
adv.
Krause, Michael

Date	Costs	Amount
12/05/22	Lexis Nexis - November public records access/research	112.14
	Total costs	<u>\$112.14</u>
	Total fees and costs	<u>\$112.14</u>
	Amount due --->	<u>\$112.14</u>

*** Payment due 30 days from Invoice date ***

You may pay online:
<https://secure.lawpay.com/pages/brunnandflynnlaw/operating>

Please email billing questions to: vmoore@brunn-flynn.com

Federal ID: 94-2336259



A T T O R N E Y S

928 12th Street, Suite 200, Modesto, CA 95354
 T: (209) 521-2133 F: (209) 521-7584
www.brunnandflynnlaw.com

March 13, 2023

TLSKrause@gmail.com

File#: 6892-21288
 Invoice#: 99158

Re: Krause, Tara
 adv.
 Krause, Michael

Date	Fees	Hours	Amount
02/07/23	HJM Review court case status online; no ruling on Motion for Attorneys Fees on file.	0.2	35.00
	Total fees	0.2	\$35.00
	Total fees and costs		\$35.00
	Amount due --->		\$35.00

*** Payment due 30 days from Invoice date ***

You may pay online:
<https://secure.lawpay.com/pages/brunnandflynnlaw/operating>

Please email billing questions to: vmoore@brunn-flynn.com

Federal ID: 94-2336259



A T T O R N E Y S

928 12th Street, Suite 200, Modesto, CA 95354
 T: (209) 521-2133 F: (209) 521-7584
www.brunnandflynnlaw.com

April 13, 2023

TLSKrause@gmail.com

File#: 6892-21288
 Invoice#: 99430

Re: Krause, Tara
 adv.
 Krause, Michael

Date	Fees	Hours	Amount
03/15/23	DMJ Review Court's Order granting client sanctions.	0.9	382.50
03/16/23	GEB Review court's decision regarding sanctions.	0.4	170.00
03/17/23	DJP Review documents from court; review billing.	0.2	35.00
03/29/23	DMJ Communicate with Richard Min regarding meet and confer over anticipated opposition to Magistrate's recommendations and Order regarding sanctions.	0.2	85.00
03/30/23	HJM Review case with Attorney Drexwell Jones; review Court Order regarding award attorneys fees and costs; review Local Rules regarding cost bill and form; telephone call with Judge Boone's clerk regarding Order overrides local rules.	0.4	70.00
03/31/23	HJM Print and save Petitioner's Request for Reconsideration and supporting documents.	0.3	52.50
	Total fees	2.4	\$795.00
	Total fees and costs		\$795.00
	Amount due --->		<u>\$795.00</u>

April 13, 2023

TLSKrause@gmail.com

File#: 6892-21288
Invoice#: 99430

Re: Krause, Tara

*** Payment due 30 days from Invoice date ***

You may pay online:

<https://secure.lawpay.com/pages/brunnandflynnlaw/operating>

Please email billing questions to: vmoore@brunn-flynn.com

Federal ID: 94-2336259

EXHIBIT B

Specializing in the Serving of Legal Papers and Courier Service

DATE SEPT. 20, 2022.

PARTY SERVED: 1) MICHAEL KRAUSE-1100 ROSEVILLE
PARKWAY#1227 ROSEVILLE, CA, 2) SAVANNAH WADSWORTH
1150 9TH ST.#1410 MODESTO, CA.

DATE SERVED: 9/19, 20/22

96

PRILACK - ONE WAY

• 附錄 5

PER MAIL

\$ 278.00

PAGES

Types of Empora

NO.

FREE

SUMMONS - MARRIAGE

§ 100.100

COMPLAINT - PUNISHION

7 5 0 2 0 1 5

ORDER TO SHOW CAUSE — Re-Contempt

• • • • •

NOTICE: 3 days to pay rent or quit

• • • • •

NOTICE: 30 days to vacate premises

1 1 4 9 1 4 1 4 1

AFFIDAVIT OF EXAMINATION

60 00

SUPERDA

60.00

SUBPOENA DUCES TECUM

60 00

CONFIDENTIAL

RUSH

30.00

CITATION

TOTAL: \$ 428.40

WAITING TIME

HOURS AT \$

PER HOUR

5

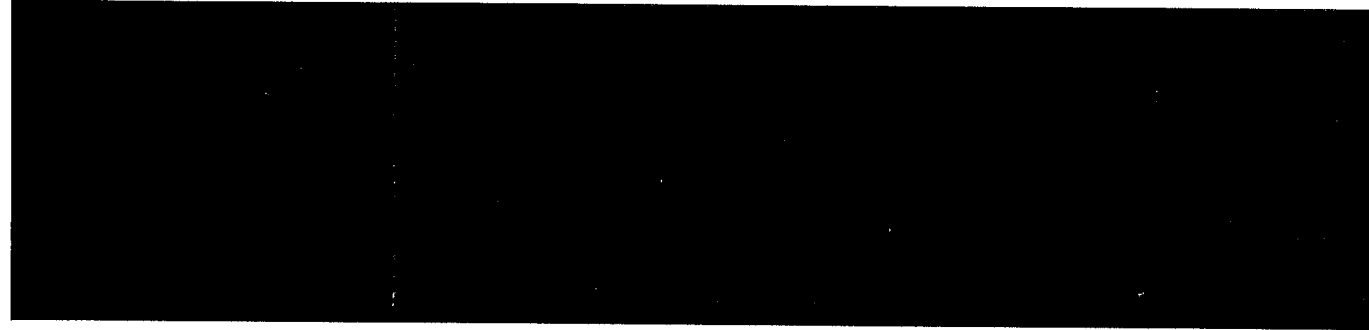
GRAND TOTAL: \$

PAID BY CHECK

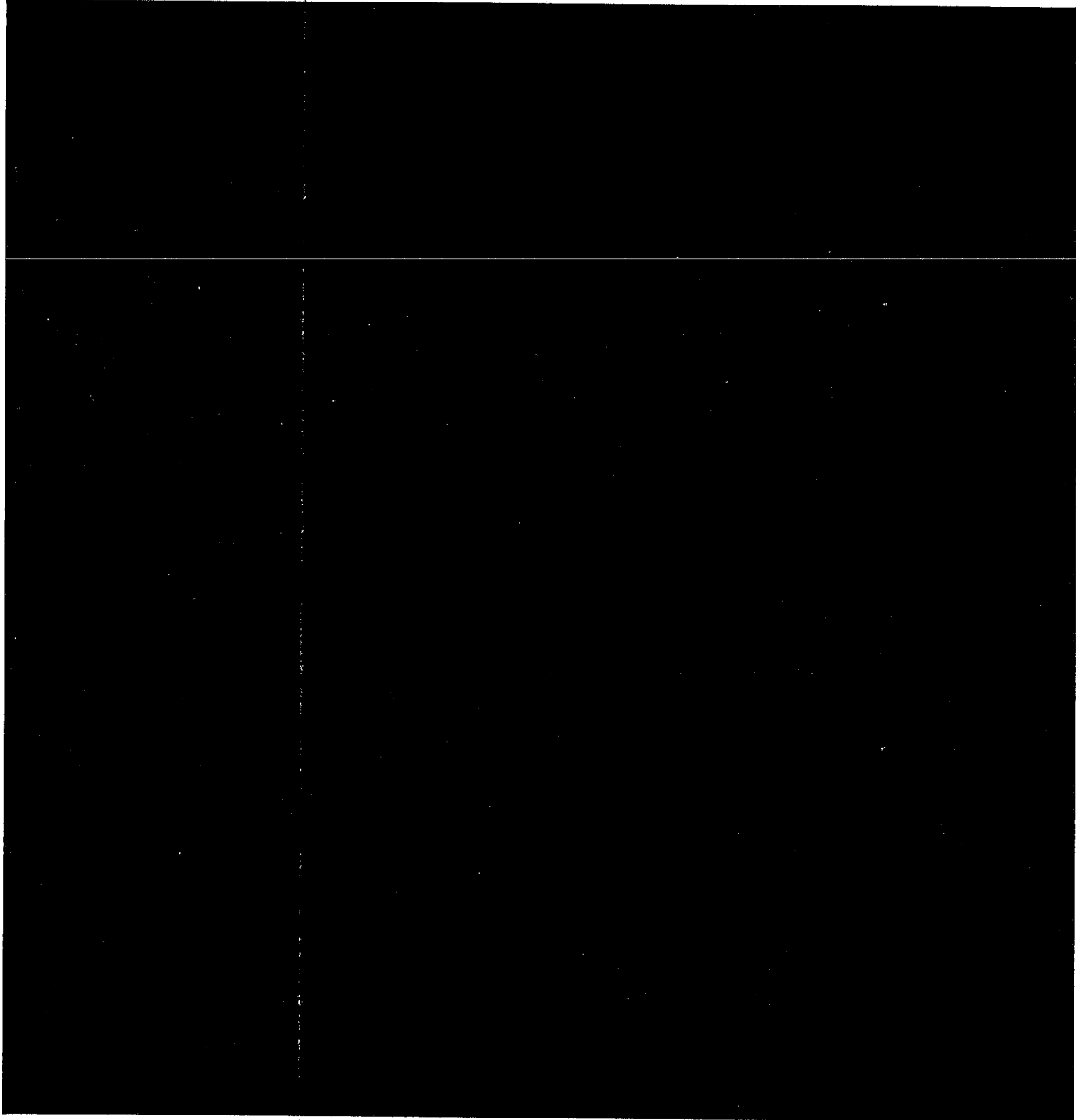
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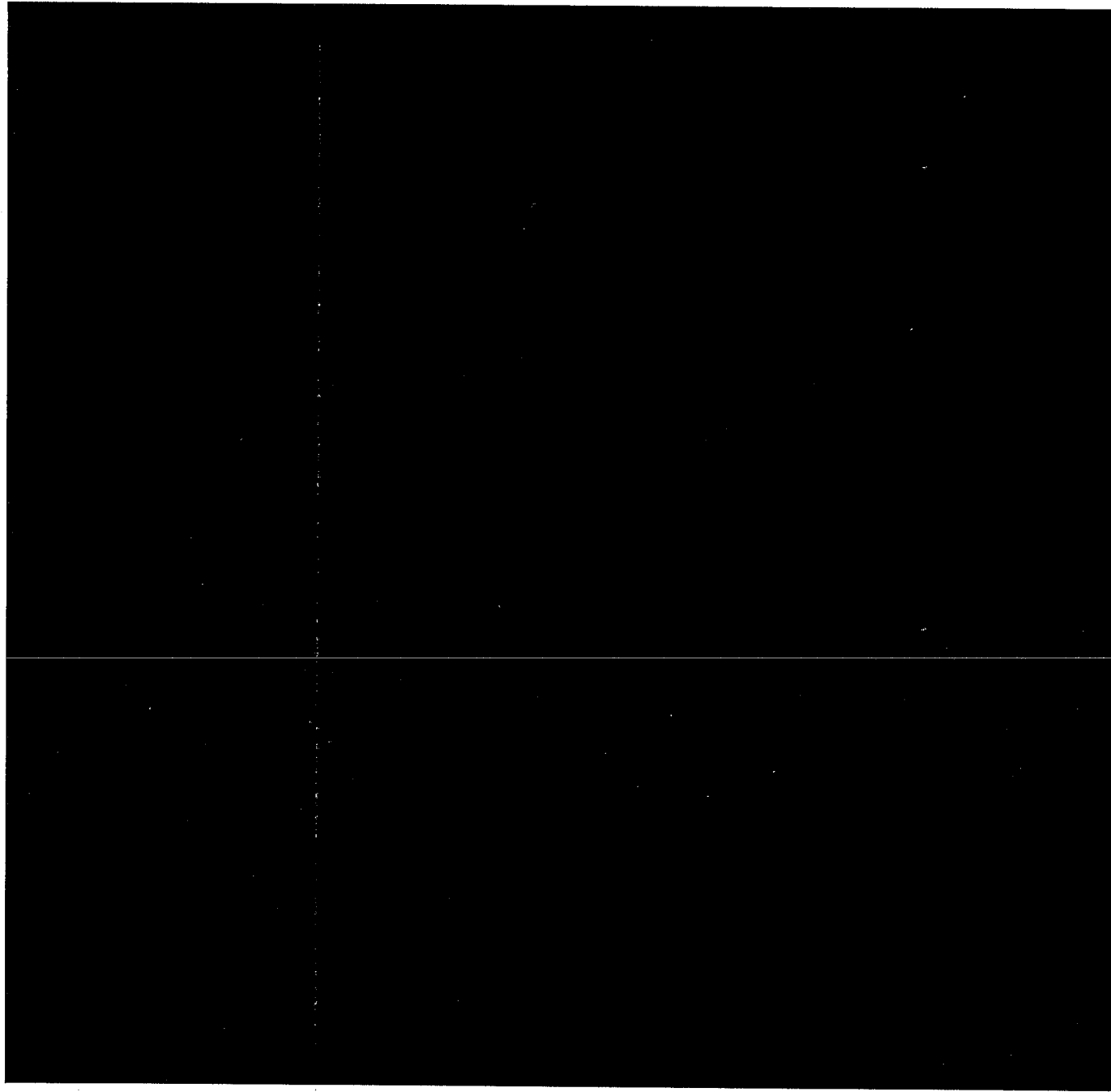
Rec'd Payment

PAID BY CHECK ON Rec'd Payment

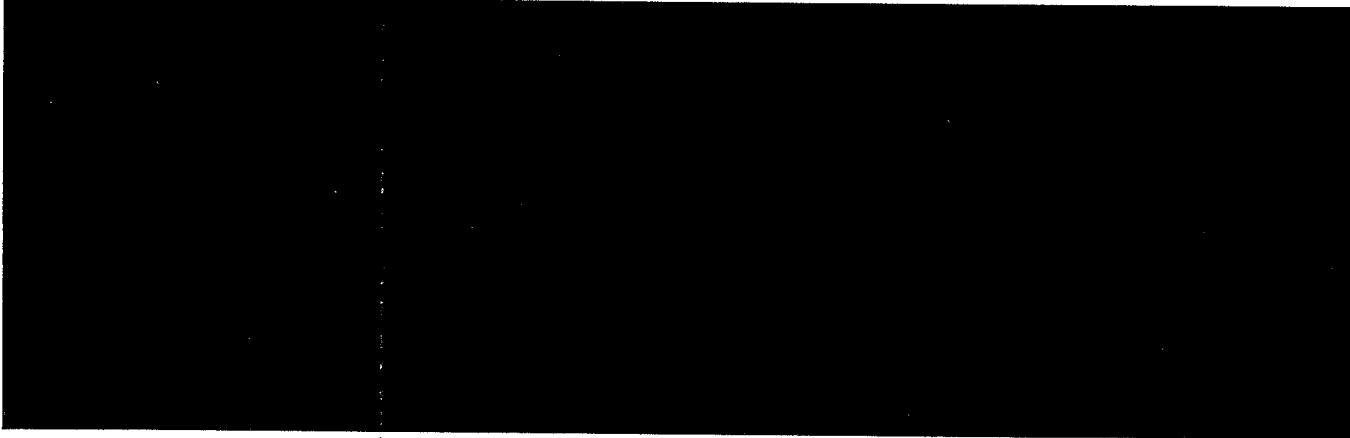


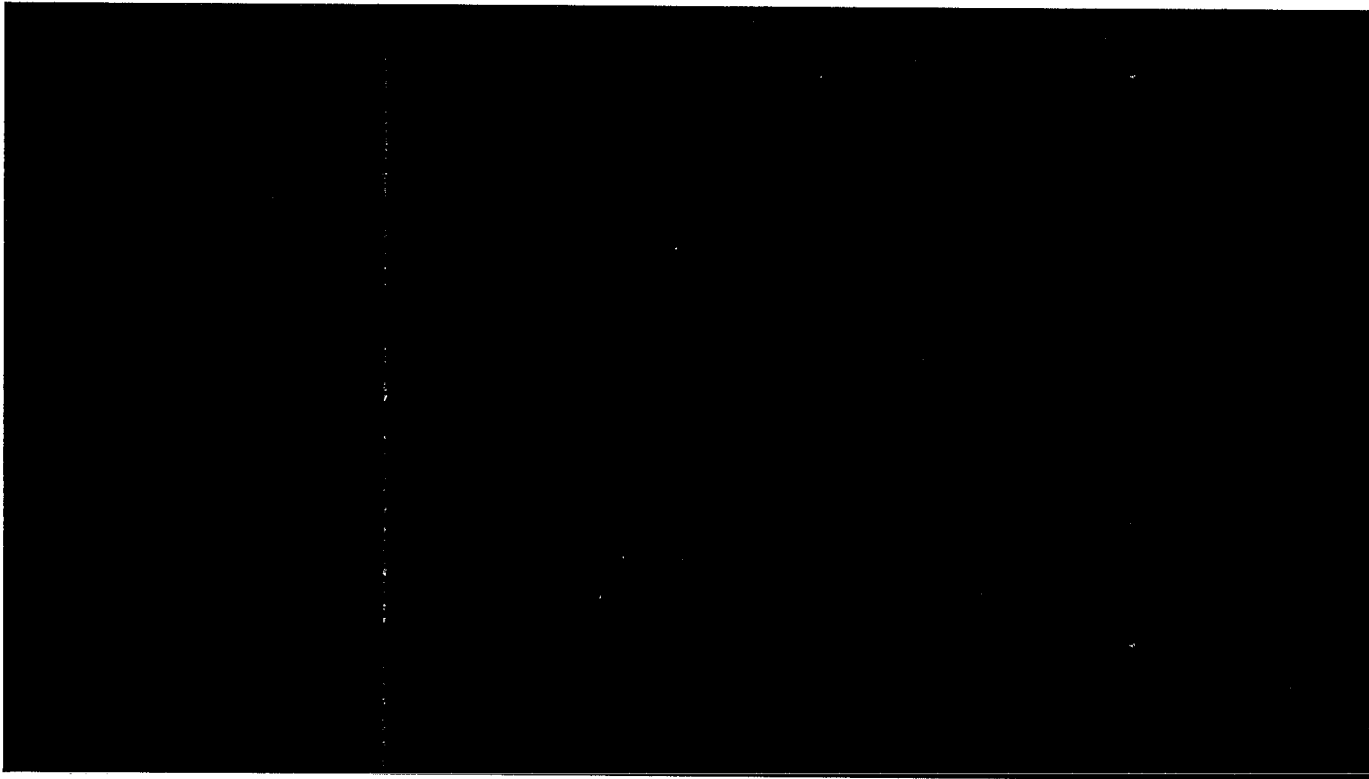
3) D COST 6892-21288 Client Name: Tara Krause
Re: Krause, Tara
05/31/22 06/07/22 0.00 793.58 0.00 793.58
Lexis Nexis - May public records access/research



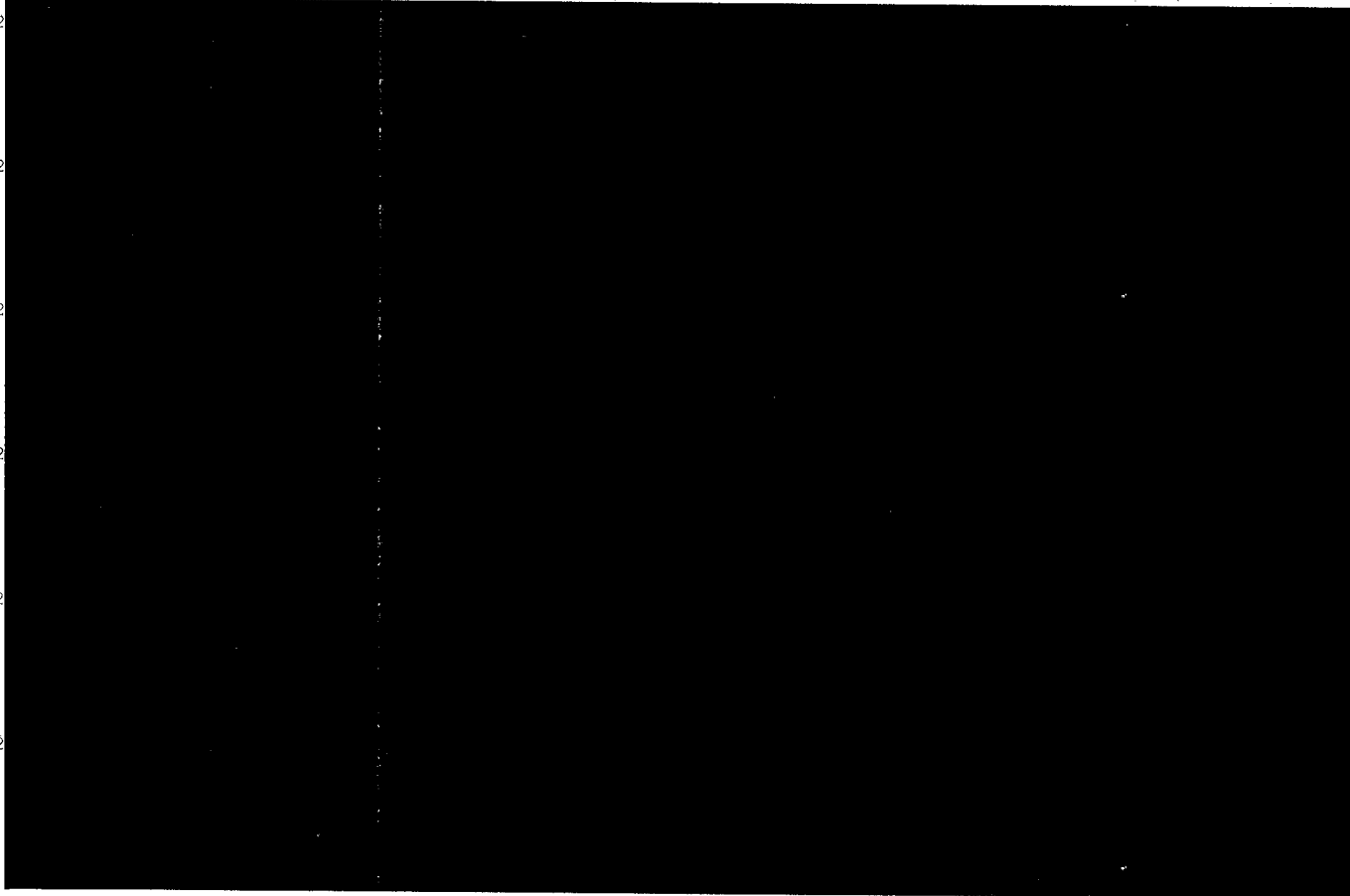


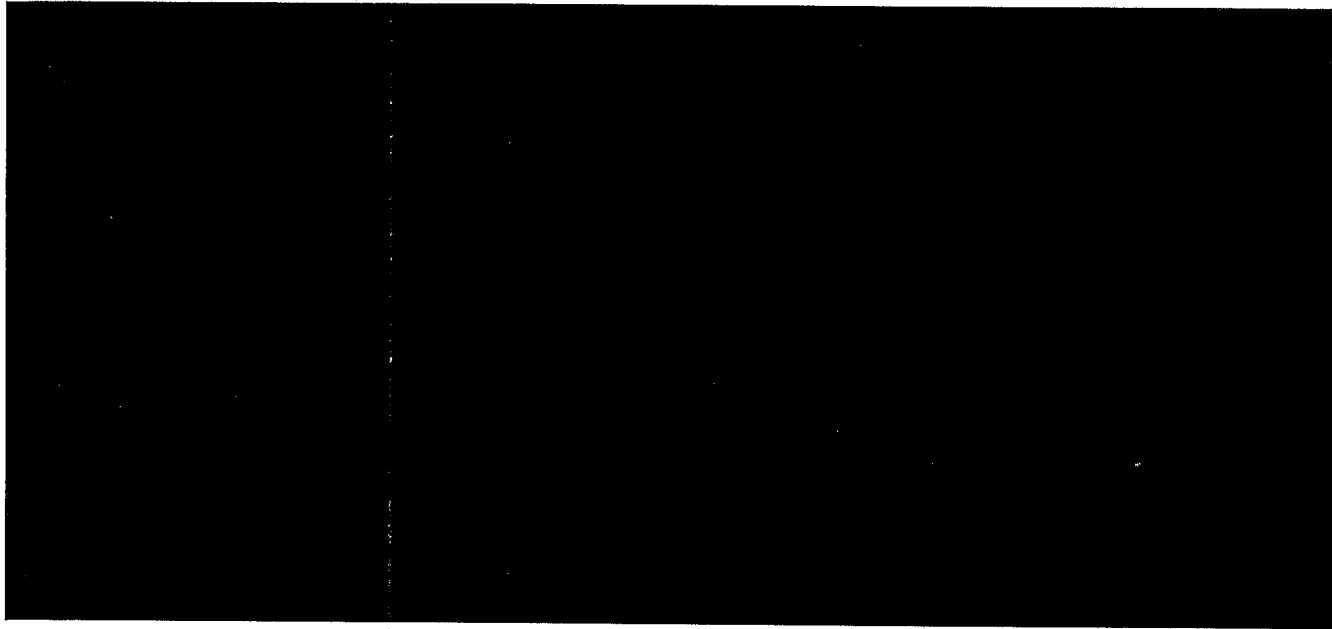
10) D COST 6892-21288 Client Name: Tara Krause
Re: Krause, Tara
06/30/22 07/05/22 0.00 216.21 0.00 216.21
Lexis Nexis - June public records access/research



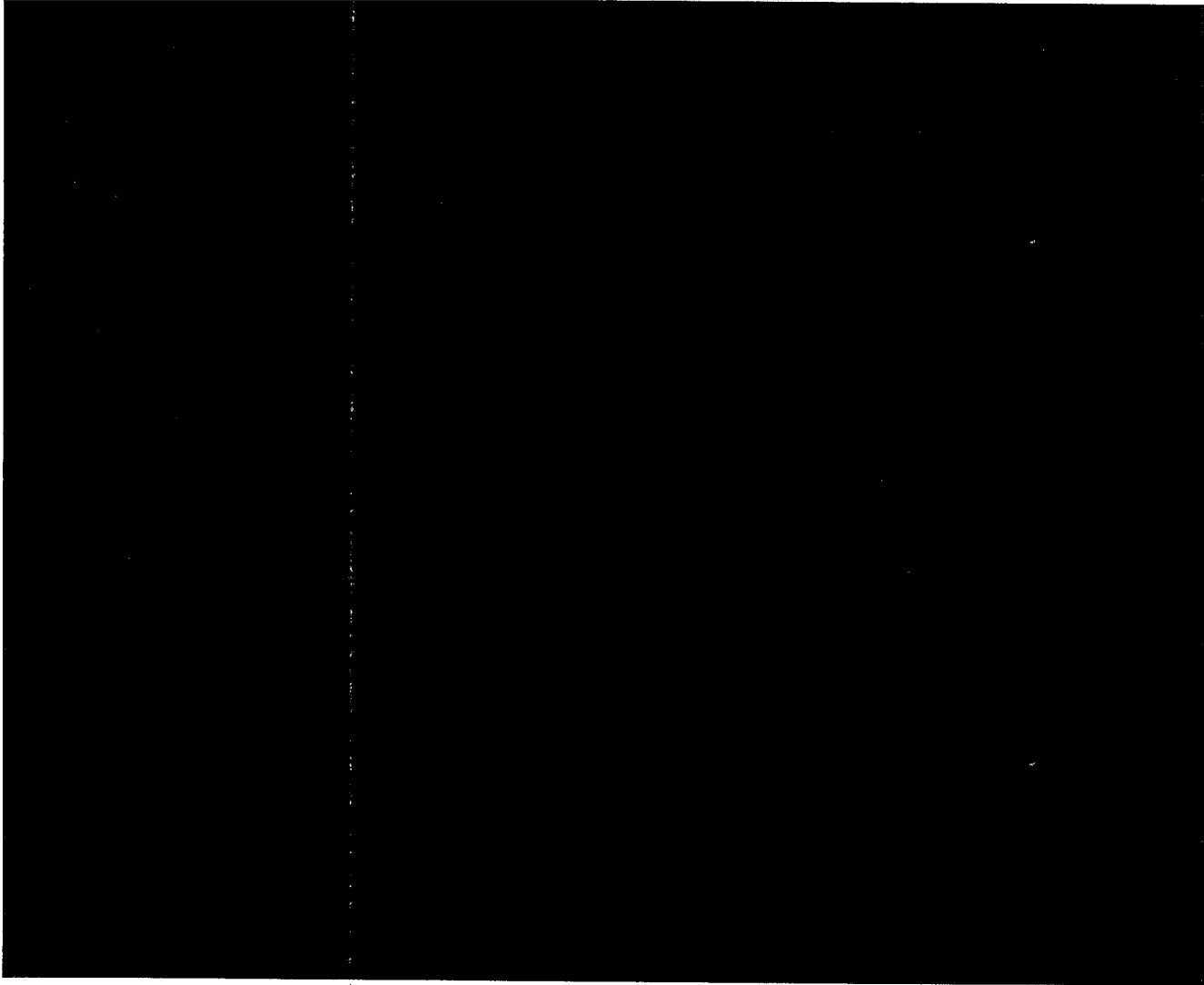


19) D COST 6892-21288 Client Name: Tara Krause
Re: Krause, Tara
07/31/22 08/02/22 0.00 13.37 0.00 13.37
Lexis Nexis - July public records access/research

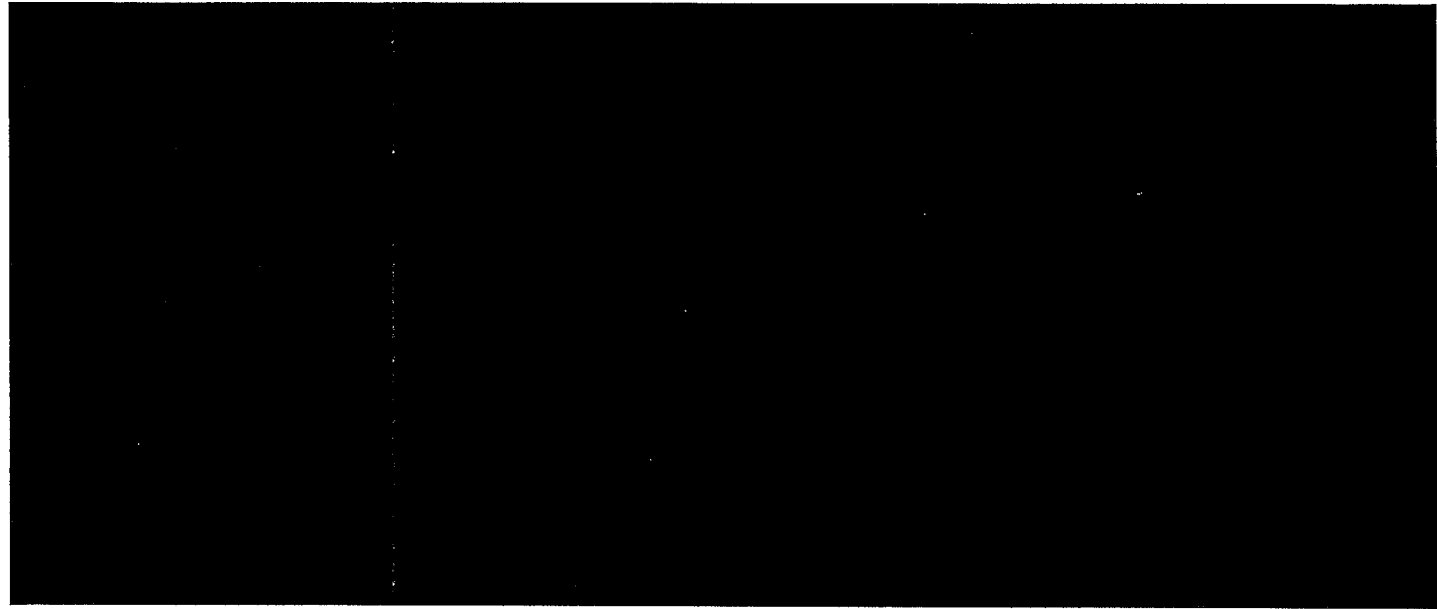




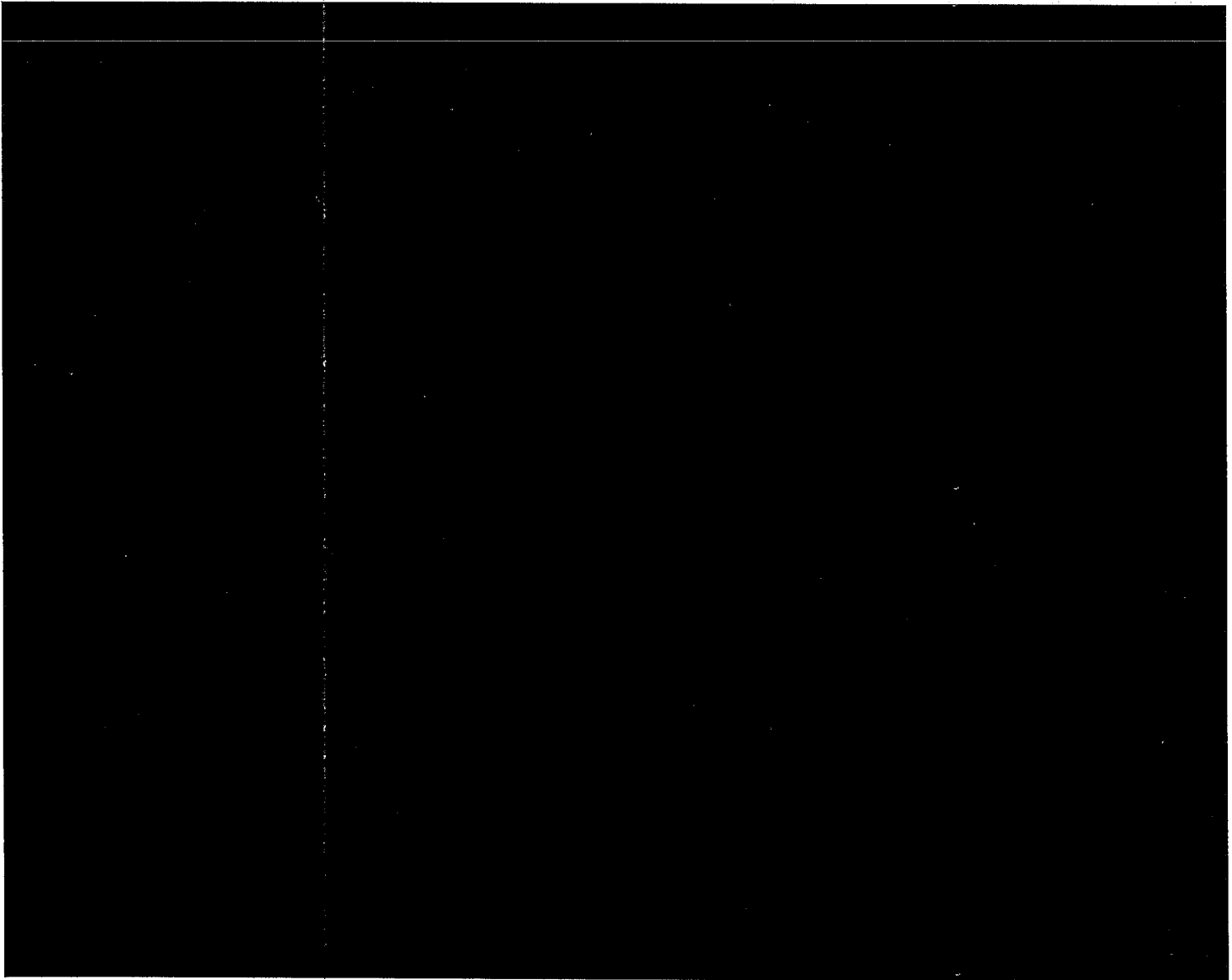
18) D COST 6892-21288 Client Name: Tara Krause
Re: Krause, Tara
08/31/22 09/06/22 0.00 44.71 0.00 44.71
Lexis Nexis - August public records access/research

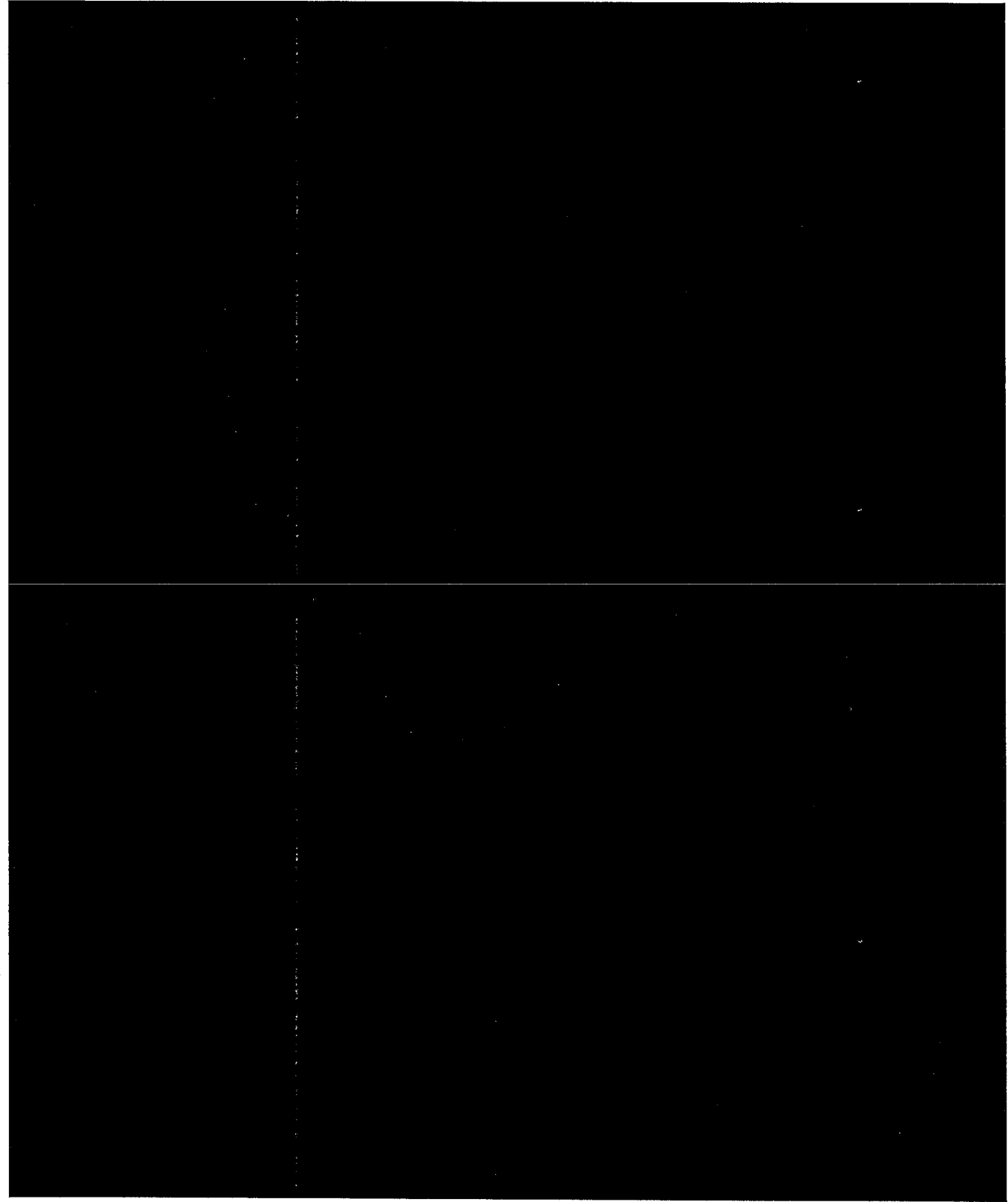


10) D COST 6892-21288 Client Name: Tara Krause
Re: Krause, Tara
09/30/22 10/10/22 0.00 71.94 0.00 71.94
Lexis Nexis - September public records access/research



5) D COST 6892-21288 Client Name: Tara Krause
Re: Krause, Tara
10/31/22 11/03/22 0.00 248.82 0.00 248.82
Lexis Nexis - October public records access/research





25) D COST 6892-21288 Client Name: Tara Krause
 Re: Krause, Tara
 12/05/22 12/05/22 0.00 112.14 0.00 112.14
 Lexis Nexis - November public records access/research

1) D COST 6892-21288 Client Name: Tara Krause

Re: Krause, Tara

Trans	Entry	Stat Grp	-----	Actual	-----	-----	Billable	-----
10/31/22	11/03/22			0.00	17.18		0.00	17.18
Postage								

TOTALS	Actual	Billable	Write-up	Write-down
Dir Cost Units	0.00	0.00	0.00	0.00
Dir Cost \$	17.18	17.18	0.00	0.00